

<b>UNITED STATES BANKRUPTCY COURT</b> <b>DISTRICT OF NEW JERSEY</b> Caption in Compliance with D.N.J. LBR 9004-2(c)	
<b>Robertson, Anschutz, Schneid, Crane &amp; Partners, PLLC</b> 130 Clinton Road, Lobby B, Suite 202 Fairfield, NJ 07004 Telephone: 973-575-0707 Facsimile: 973-404-8886 Attorneys For Secured Creditor	
<b>In Re:</b>  <b>Michael Moshe Cohen and</b> <b>Nancy Louise Cohen,</b> <b>Debtors.</b>	Case No.: 23-10086-SLM  Chapter: 7  Hearing Date: March 12, 2024  Judge: Stacey L. Meisel

**LIMITED RESPONSE TO MOTION TO SELL PROPERTY FREE AND CLEAR OF**  
**LIENS UNDER SECTION 363(F)**

U.S. Bank N.A., as trustee, on behalf of the holders of the J.P. Morgan Mortgage Trust 2007-S3 Mortgage Pass-Through Certificates (“Secured Creditor”), by and through undersigned counsel, hereby files its Limited Response to Motion to Sell Property Free and Clear of Liens under Section 363(f) (Docket 93) (hereinafter the “Motion”) and, in support thereof, states as follows:

1. Michael Moshe Cohen and Nancy Louise Cohen (“Debtors”) filed the instant Chapter 7 Petition on January 4, 2023 (the “Petition Date”).
2. Secured Creditor holds a security interest in the Debtors’ real property located at 7 STANFORD CT WEST ORANGE New Jersey 07052 (the “Property”) by virtue of a Mortgage in the principal amount of \$447,200.00, dated April 2, 2007 and recorded in the Office of the Clerk/Register of Deeds for Essex County on April 23, 2007 in Book 12047, at Page 7511 (the “Mortgage”).
3. On February 9, 2024, Ilissa Churgin Hook (“Trustee”) filed the instant Motion to Sell Property (the "Motion"). The Trustee’s Motion seeks the Court's approval to sell the Subject Property for \$580,000.00 (the "Proposed Sale Price").

4. The estimated payoff of Secured Creditor's lien is \$423,481.08 as of February 16, 2024. Please contact the servicer, Select Portfolio Servicing, at 1-800-258-8602 for an updated payoff at or near the scheduled closing of the sale.
5. Secured Creditor does not object to the Debtor's Motion to the extent that any sale is subject to Secured Creditor's lien remaining attached to subject property until paid in full based upon an up to date payoff quote.
6. Furthermore, Secured Creditor requests the Order contain a provision stating failure to complete any sale within 90-days of entry of this Order will result in the Order authorizing the sale to be deemed moot.
7. Secured Creditor reserves the right to supplement this response at or prior to any hearing on this matter.

**WHEREFORE,** Secured Creditor respectfully requests entry of an order in compliance with the above conditions and for such other and further relief as the Court deems just and proper.

Dated: February 26, 2024

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Crane & Partners, PLLC**  
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**CERTIFICATION OF SERVICE**

1. I, Kenneth J. Borger, Esq., represent Secured Creditor in this matter.
2. On February 26, 2024, I caused a copy of the following pleadings and/or documents to be sent to the parties listed in the chart below. Limited Response to Motion to Sell Property Free and Clear of Liens under Section 363(f)
3. I certify under penalty of perjury that the above documents were sent using the mode of service indicated.

**Robertson, Anschutz, Schneid,  
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Attorneys for Secured Creditor

By: /s/ Kenneth J. Borger  
NJ Bar ID: 171092015  
Email: kborger@raslg.com

Name and Address of Party Served	Relationship of Party to Case	Mode of Service
<p>Michael Moshe Cohen 7 Stanford Court West Orange, NJ 07052</p> <p>Nancy Louise Cohen 7 Stanford Court West Orange, NJ 07052</p>	Debtors	<p><input type="checkbox"/> Hand Delivered  <input checked="" type="checkbox"/> Regular Mail  <input type="checkbox"/> Certified Mail/RR  <input type="checkbox"/> E-Mail  <input type="checkbox"/> Notice of Electronic Filing (NEF)  <input type="checkbox"/> Other _____  (as authorized by court*)</p>
<p>Roger L. Fidler Law Offices of Roger L. Fidler 1522 Gardner Drive Lutz, FL 33559-3305</p>	Debtors' Attorney	<p><input type="checkbox"/> Hand Delivered  <input checked="" type="checkbox"/> Regular Mail  <input type="checkbox"/> Certified Mail/RR  <input type="checkbox"/> E-Mail  <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF)  <input type="checkbox"/> Other _____  (as authorized by court*)</p>
<p>Ilissa Churgin Hook Norgaard, O'Boyle &amp; Hannon 184 Grand Avenue Englewood, NJ 07631</p> <p>Milica A. Fatovich Norgaard O'Boyle &amp; Hannon 184 Grand Ave. Englewood, NJ 07631</p>	Trustee	<p><input type="checkbox"/> Hand Delivered  <input checked="" type="checkbox"/> Regular Mail  <input type="checkbox"/> Certified Mail/RR  <input type="checkbox"/> E-Mail  <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF)  <input type="checkbox"/> Other _____  (as authorized by court*)</p>
<p>U.S. Trustee US Dept of Justice Office of the US Trustee One Newark Center Ste 2100 Newark, NJ 07102</p>	US Trustee	<p><input type="checkbox"/> Hand Delivered  <input checked="" type="checkbox"/> Regular Mail  <input type="checkbox"/> Certified Mail/RR  <input type="checkbox"/> E-Mail  <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF)  <input type="checkbox"/> Other _____  (as authorized by court*)</p>

\* May account for service by fax or other means as authorized by the court through the issuance of an Order Shortening Time.